

BVA response to European Medicines Agency Concept paper for the development of a guideline on the methodology of environmental risk assessment for ectoparasitocidal VMPs for cats and dogs

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Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. We welcome the opportunity to contribute to the European Medicines Agency (EMA) Concept paper for the development of a guideline on the methodology of environmental risk assessment for ectoparasitocidal veterinary medicinal products (VMPs) for cats and dogs.

General comments

3. We strongly support the concept of Phase II environmental risk assessments (ERAs) for companion animal products, and welcome the EMA's continued work on this topic.
4. We have been working to raise concerns regarding the environmental fate of companion animal parasiticide VMPs. Companion animal VMPs are used widely on an increasingly large population of pets, and we believe that the quantities used are significant enough to warrant the additional level of risk assessment currently only required for food-producing animal VMPs.
5. The [BVA, BSAVA and BVZS policy position on responsible use of parasitocides for cats and dogs](#) specifically recommends a review of the requirements for environmental impact assessment of companion animal parasiticide products. A Phase II ERA would enable veterinary professionals to better understand the risks associated with the products they use, to make responsible prescribing decisions and provide clearer guidance to animal owners.
6. We support development of these guidelines, which will enable applicants to design, carry out and report on the environmental exposure, fate and effects of parasitocidal VMPs for companion animals based on agreed criteria, whenever an ERA could be required in the frame of a relevant regulatory procedure.

We recognise that the UK is no longer part of the EMA, but under the announced SPS agreement we expect to be working closely together, and recognise that any divergence in standards could add complexity to this relationship, particularly in Northern Ireland. We will continue to call on the UK Veterinary Medicine Directorate to review the requirements for environmental impact assessment of companion animal parasiticide products.